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7 Attorney for Defendant  
GERALD ARMSTRONG  
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ORIGINAL FILED

MAY 11 1992

LOS ANGELES  
SUPERIOR COURT

RECEIVED

MAY 13 1992

HUB LAW OFFICES

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
11 IN AND FOR THE COUNTY OF LOS ANGELES  
12

13 CHURCH OF SCIENTOLOGY )  
14 INTERNATIONAL, a California )  
not-for-profit religious )  
15 corporation; )

16 Plaintiffs, )

17 vs. )

18 GERALD ARMSTRONG; DOES 1 )  
through 25, inclusive, )

19 Defendants. )  
20 )  
21 )

No. BC 052395

NOTICE OF MOTION AND MOTION  
TO QUASH DEPOSITION SUBPOENA  
FOR MICHAEL J. FLYNN;  
DECLARATION OF COUNSEL;  
MEMORANDUM OF POINTS AND  
AUTHORITIES IN SUPPORT THEREOF

Date: 6-4-92  
Time: 8:30 a.m.  
Dept: 30  
Trial Date: None  
Discovery Cut Off: None

22 TO ALL INTERESTED PARTIES AND THEIR ATTORNEYS OF RECORD:

23 PLEASE TAKE NOTICE that on the 4<sup>th</sup> day of June,  
24 1992, at 8:30 a.m., or as soon thereafter as the matter may be  
25 heard in Department 30 of the above-entitled Court, Defendant  
26 GERALD ARMSTRONG will move for an Order quashing the Deposition  
27 Subpoena that was served on third-party witness Michael J. Flynn.  
28 Further ARMSTRONG will seek an Order compelling plaintiff CHURCH

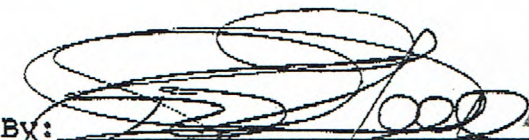
1 OF SCIENTOLOGY INTERNATIONAL and its attorneys, Wilson, Ryan and  
2 Campilongo and Bowles and Moxon to pay monetary sanctions for  
3 requiring ARMSTRONG to bring the instant motion.

4 As to the motion to quash, this motion is brought pursuant to  
5 Code of Civil Procedure section 2025 (g) on the ground that notice  
6 of said deposition was served by mail and was less than required  
7 by Code of Civil Procedure sections 1013 (a) and 2025 (f).

8 As to the motion for sanctions, this motion is brought  
9 pursuant to Code of Civil procedure sections 2023 and 2025 (g).

10 This motion is based upon the instant Notice, the Declaration  
11 of Counsel submitted herewith and the Memorandum of Points and  
12 Authorities In Support filed herewith, and the court's files and  
13 records in this case.

14 DATED: May 11, 1992

15  
16 

17 BY: FORD GREENE and PAUL MORANTZ  
18 Attorneys for Defendant  
19 GERALD ARMSTRONG  
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PROOF OF SERVICE

I am employed in the County of Marin, State of California. I am over the age of eighteen years and am not a party to the above entitled action. My business address is 711 Sir Francis Drake Boulevard, San Anselmo, California. I served the following documents: NOTICE OF MOTION AND MOTION TO QUASH DEPOSITION SUBPOENA OF MICHAEL J. FLYNN; DECLARATION OF COUNSEL; MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT THEREOF; [Proposed] ORDER

on the following person(s) on the date set forth below, by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid to be placed in the United States Mail at San Anselmo, California:

Andrew Wilson, Esquire  
WILSON, RYAN & CAMPILONGO  
235 Montgomery Street, Suite 450  
San Francisco, California 94104

Laurie J. Bartilson, Esq.  
Bowles & Moxon  
6255 Sunset Boulevard, Suite 2000  
Los Angeles, California 90028

By Telecopier  
213-662-6419

Graham E. Berry, Esquire  
LEWIS, D'AMATO, BRISBOIS & BISGAARD  
221 North Figueroa Street. Suite 1200  
Los Angeles, California 90012

By Telecopier  
213-750-7900

- (By Mail) I caused such envelope with postage thereon fully prepaid to be placed in the United States Mail at San Anselmo, California.
- (Personal Service) I caused such envelope to be delivered by hand to the offices of the addressee.
- (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

DATED: May 11, 1992

